

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

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UNITED STATES OF AMERICA	§	
	§	
V.	§	No. 1:19-CR-000482-01
	§	
ROBIN LONGORIA	§	

**UNOPPOSED MOTION FOR CONTINUANCE**

To the Hon. Christopher A. Boyko:

Robin Longoria, defendant, by and through counsel, moves the Court to continue the scheduling hearing until March 2, 2020 because of the demands of counsel's caseload.

This matter is currently set for sentencing on Tuesday, January 8, 2020.

However, counsel's caseload includes preparation for a trial and other significant matters that will interfere with his preparation for Ms. Longoria's sentencing hearing. Specifically:

1. Counsel is set for trial on December 9, 2019, in the 396<sup>th</sup> District Court of Tarrant County, Texas, in cause number 1621052 styled *The State of Texas v. Donald Daniels*. This case involves an allegation of Engaging in Organized Crime. The State's witness list includes 95 persons. Because of

the extent of potential evidence at trial, counsel expects that the trial in this matter will not be concluded before the current sentencing setting.

2. Counsel is set for a sentencing hearing on January 7, 2020, before the Honorable Terry R. Means in the Northern District of Texas, in cause number 4:18-CR-00298-Y styled *United States v. Emir Adel Chehab*. Mr. Chehab has been in custody since February 7, 2019.
3. Counsel has a deadline for the preparation of an Appellant's Brief due on December 30, 2019, for the 5<sup>th</sup> Circuit Court of Appeals, in cause number 19-10944 styled *United States of America v. Marcello Shofner*.

Counsel is mindful that one of these obligations pertains to a state matter and that this Court's business takes precedence. Unfortunately, this state matter has been pending for more than 18 months. Counsel is hopeful that a continuance until March 2, 2020, would not detrimentally affect the Court.

## **Conclusion**

Counsel for the reasons stated above, requests a continuance until March 2, 2020.

Respectfully submitted,

**//Steve Jumes//**

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## **CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that he discussed the above and foregoing submission on November 26, 2019, with Assistant United States Attorney Chelsea Rice who indicated that she is not opposed to this motion.

**//Steve Jumes//**

Steve Jumes

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing submission was served on all counsel as well as Assistant United States Attorney Chelsea Rice via ECF filing on December 2, 2019.

**//s// Steven Jumes**

Steven Jumes